

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

IN THE MATTER OF:

Chapter 13

Angela L. Thomas,

Case No. 07-71977

Debtor(s).

Honorable Manuel Barbosa

**RESPONSE TO TRUSTEE'S NOTICE OF PAYMENT OF
FINAL MORTGAGE CURE AMOUNT**

NOW COMES PNC Bank, National Association (hereinafter referred to as "Movant") by and through its attorneys, Heavner, Scott, Beyers and Mihlar, LLC, and for its Response to Trustee's Notice of Payment of Final Mortgage Cure Amount, states as follows:

1. On or about August 31, 2007, Movant filed its Proof of Claim as Claim Number 2 for a sum of \$2,451.79 in pre-petition arrears.
2. The Debtor's Modified Chapter 13 Plan filed on September 13, 2007, and confirmed on November 27, 2007, set-forth a pre-petition arrearage amount owed to National City Mortgage in the amount of \$2,604.00.
3. Movant's pre-petition arrears of \$2,451.79 were paid by the Chapter 13 Trustee in full.
4. The Debtor's post-petition payments to Movant were to be paid by the Debtor directly "outside" of the plan.
5. The Debtor is currently due for two mortgage payments for the monthly payments due for November 2011 through December 2011 in the amount of \$480.74 per month; attorney fees of \$75.00 and \$269.43 for an escrow shortage; for a total default of \$1,305.91 as of December 8, 2011.

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WHEREFORE, PNC Bank, National Association, prays that the Court declare that the post-petition payments are not current at this time.

PNC Bank, National Association,

By: /s/ Heather M. Giannino
One of its attorneys

HEAVNER, SCOTT, BEYERS & MIHLAR, LLC
Attorneys at Law
Faiq Mihlar (ARDC #6274089)
Heather M. Giannino (ARDC #6299848)
111 East Main Street, Suite #200
Post Office Box 740
Decatur, Illinois 62525-0740
(217) 422-1719